

EXHIBIT 82
FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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WAYMO LLC,

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)

Plaintiff ,

)

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vs.

)

Case No: 3:17-cv-00939-WHA

)

UBER TECHNOLOGIES, INC.,

)

OTTOMOTTO LLC, OTTO TRUCKING,)

LLC,

)

)

Defendants.

)

)

CONFIDENTIAL - ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF DANIEL GRUVER
San Francisco, California
Thursday, April 20, 2017

Reported by:

LISA R. TOW

CSR No. 6629

Job No. 2599857

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25	Q. But through that input then,	09:28:44AM
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1 But, it used two lenses in each of 09:30:28AM
2 eight optical cavities. So I could consider 09:30:32AM
3 that sixteen lenses. 09:30:35AM
4 Q. Did it at any point in the design 09:30:37AM
5 use one lens to both transmit -- let me 09:30:46AM
6 start over again. 09:30:51AM
7 Did the lenses that the Spider design 09:30:52AM
8 use, both transmit and receive light? 09:31:04AM
9 A. Yes. 09:31:06AM
10 Q. And that's true for each of those 09:31:08AM
11 lenses; correct? 09:31:12AM
12 A. Each -- yes. It was a pair of 09:31:13AM
13 lenses in sequence. 09:31:19AM
14 Q. Right. But each -- each of the 09:31:22AM
15 sixteen lenses both transmitted and received 09:31:26AM
16 light? 09:31:31AM
17 A. No. There were eight pairs of 09:31:31AM
18 lenses. The two lenses together formed an 09:31:35AM
19 optical system. 09:31:38AM
20 Q. Who came up with the lens design 09:31:49AM
21 for Spider? 09:32:10AM
22 A. I don't recall. 09:32:11AM
23 Q. Was -- it wasn't you? 09:32:12AM
24 A. No. 09:32:20AM
25 Q. Was it Anthony Levandowski? 09:32:20AM

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1 [REDACTED] [REDACTED]
2 [REDACTED] 09:37:22AM
3 Q. And that was around the same time 09:37:22AM
4 that it was publically announced? 09:37:26AM
5 A. Yeah, I think it was exactly the 09:37:28AM
6 same time. 09:37:31AM
7 Q. [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED]
12 [REDACTED] [REDACTED]
13 [REDACTED] [REDACTED]
14 [REDACTED] [REDACTED]
15 [REDACTED] [REDACTED]
16 [REDACTED] [REDACTED]
17 [REDACTED] 09:38:08AM
18 Q. The -- going back to Spider. Did 09:38:13AM
19 Spider use eight fiber lasers? 09:38:26AM
20 A. Yes. 09:38:30AM
21 Q. Who came up with the idea to use 09:38:30AM
22 eight fiber lasers? 09:38:34AM
23 A. A combination of engineers. 09:38:35AM
24 Q. Can you name any specific people 09:38:37AM
25 that you are aware of that were involved in 09:38:39AM

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1	lawsuit in which Mr. Levandowski may have	10:33:03AM
2	briefly addressed the allegations?	10:33:06AM
3	A. I was present at the meeting.	10:33:09AM
4	Q. What did Mr. Levandowski say?	10:33:11AM
5	A. I don't recall.	10:33:12AM
6	Q. [REDACTED]	[REDACTED]
7	[REDACTED]	[REDACTED]
8	[REDACTED]	[REDACTED]
9	[REDACTED]	[REDACTED]
10	[REDACTED]	[REDACTED]
11	[REDACTED]	[REDACTED]
12	[REDACTED]	[REDACTED]
13	[REDACTED]	[REDACTED]
14	[REDACTED]	[REDACTED]
15	[REDACTED]	[REDACTED]
16	[REDACTED]	[REDACTED]
17	[REDACTED]	[REDACTED]
18	[REDACTED]	[REDACTED]
19	[REDACTED]	[REDACTED]
20	[REDACTED]	[REDACTED]
21	[REDACTED]	[REDACTED]
22	[REDACTED]	[REDACTED]
23	[REDACTED]	[REDACTED]
24	Q. So safe to say you don't really	10:33:56AM
25	have a good memory of what he said at that	10:33:58AM

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1	have happened, but I --	10:50:17AM
2	Q. What was Anthony Levandowski's	10:50:20AM
3	role in the decision to pivot from Spider to	10:50:23AM
4	Fuji?	10:50:27AM
5	A. He had the opportunity to veto a	10:50:28AM
6	design change. But didn't. So, I guess --	10:50:34AM
7	Q. But ultimately the decision as to	10:50:42AM
8	whether to pivot from Spider to Fuji would	10:50:44AM
9	have been up to Anthony Levandowski; fair?	10:50:49AM
10	A. Yes.	10:50:55AM
11	Q. Fair.	10:50:55AM
12	And was Spider designed to rotate about	10:50:58AM
13	in access?	10:51:05AM
14	A. Yes.	10:51:06AM
15	Q. Did the outgoing laser beams go	10:51:06AM
16	through a hole in a mirrored surface in	10:51:10AM
17	Spider?	10:51:13AM
18	A. Yes.	10:51:13AM
19	Q. Did the incoming reflected light	10:51:15AM
20	bounce off that mirrored surface on it's way	10:51:19AM
21	to the received block in Spider?	10:51:23AM
22	A. Yes.	10:51:24AM
23	Q. Would light transmit out and	10:51:29AM
24	return through the same lens pair in Spider?	10:51:32AM
25	A. So, we prototyped a handful of --	10:51:36AM

1 discussed a handful of designs. I'm trying 10:51:48AM
2 to remember which one was the last plan of 10:51:51AM
3 record. But, I believe the sort of last 10:51:53AM
4 plan of record had that. 10:51:56AM
5 Q. And did Spider use more than one 10:51:58AM
6 laser? 10:52:01AM
7 A. Clarify. 10:52:06AM
8 Q. Did Spider have available to it 10:52:07AM
9 the use of more than one laser? 10:52:12AM
10 A. Yes. 10:52:14AM
11 Q. And did the received block in 10:52:14AM
12 Spider use more than one receiver? 10:52:18AM
13 A. Yes. 10:52:21AM
14 Q. Did the light going out -- let me 10:52:22AM
15 start over again. 10:52:26AM
16 When the light went out in Spider would 10:52:28AM
17 it partially overlap with the path of light 10:52:34AM
18 returning to the received block? 10:52:39AM
19 A. Yes. 10:52:41AM
20 Q. And was -- were the lenses in 10:52:55AM
21 Spider were they in a housing of some kind? 10:53:09AM
22 A. Yes. 10:53:12AM
23 Q. Why don't we go off the record. 10:53:12AM
24 THE VIDEOGRAPHER: Off the record at 10:53:19AM
25 10:50 a.m. 10:53:24AM